

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

SUSAN NEESE, M.D., *et al.*,

Plaintiffs,

v.

XAVIER BECERRA, *et al.*,

Defendants.

Civil Action No. 2:21-cv-163-Z

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR
DEFENDANTS TO RESPOND TO FIRST AMENDED COMPLAINT**

Plaintiffs filed their Complaint in the above-captioned matter on August 25, 2021 (ECF No. 1), and Defendants moved to dismiss the Complaint on November 2, 2021 (ECF No. 8). In response, Plaintiffs filed their First Amended Complaint on November 23, 2021 (ECF No. 11). Pursuant to Federal Rule of Civil Procedure 15(a)(3), Defendants' responsive pleading is due on December 7. Workload delays relating to recent medical leave of undersigned counsel are interfering with undersigned counsel's ability to respond to the First Amended Complaint. Defendants therefore respectfully move this Court for an extension of time until December 14, 2021, to answer or otherwise respond to the First Amended Complaint in this action. It is respectfully submitted that good cause exists under Rule 6(b)(1) for this brief extension to accommodate the undersigned's recent medical leave, and that the requested extension will not interfere with the Court's ability to resolve this action in a just, speedy, and inexpensive manner under Rule 1. The undersigned counsel has conferred with counsel for Plaintiffs and they do not oppose the above-requested extension.

Dated December 6, 2021

Respectfully submitted,

BRIAN M. BOYNTON
Acting Assistant Attorney General

MICHELLE BENNETT
Assistant Branch Director

/s/ Jordan L. Von Bokern
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Attorneys for Defendants

Certificate of Conference

This is to certify that I have conferred with counsel for the other parties about the motion, and that the relief requested is unopposed by all parties.

/s/ Jordan L. Von Bokern
Jordan L. Von Bokern
Trial Attorney

CERTIFICATE OF SERVICE

On December 6, 2021, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Jordan L. Von Bokern

Jordan L. Von Bokern

Trial Attorney

United States Department of Justice